

**Extension to the Annual Child Enrollment Forms and Free and Reduced Priced Applications for CACFP
Day Care Home Sponsoring Organizations Operating Food Service During the COVID-19 Outbreak**
Louisiana Department of Education (LDOE) Division of Nutrition Support (DNS)

1. State Agency staff contact information:

Louisiana Department of Education Division of Nutrition Support
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2. Region: Southwest Region

3. Eligibility service providers participating in waiver and affirmation that they are in good standing:

Any LDOE DNS approved CACFP daycare home sponsoring organization in good standing, operating food service during the COVID-19 outbreak. This waiver would apply to currently approved CACFP sponsoring organizations, on behalf of existing daycare homes. This waiver request does not apply to child care centers operating CACFP.

Since all schools and many child care centers in the State of Louisiana are closed, all approved sponsoring organization and daycare homes that would operate under this waiver are operating in communities affected with the COVID-19 outbreak.

4. Description of the challenge the State agency is seeking to solve, the goal of the waiver to improve services under the Program, and the expected outcomes if the waiver is granted. [Section 12(l)(2)(A)(iii) and 12(l)(2)(A)(iv) of the NSLA]:

Challenge:

As of 1:00pm on March 13, 2020, the Governor of Louisiana issued a mandate closing all public schools across the State starting Monday, March 16, 2020. The Governor also encouraged child care institutions and daycare homes to remain open to assist with caring for children of "front line" staff. Additionally, on March 24, 2020, President Donald J. Trump approved the Major Disaster Declaration for Louisiana.

Goal:

Louisiana is requesting an extension to the annual child enrollment requirements and free and reduced priced eligibility for CACFP daycare homes. Currently, daycare homes must demonstrate compliance annually with regards to enrollment forms and free and reduced priced meal applications. Since daycare homes apply for participation at different points throughout the year, the date in which they are renewed annually differs for each home. Because of the State "stay at home" order and social distancing practices, obtaining the required documentation at the time of renewal will be difficult for some daycare home providers. Allowing for a 180-day extension to the annual requirement to obtain updated enrollment documentation and free and reduced priced applications will allow existing daycare home to continue to provide meals to children during this public health emergency.

Expected Outcomes:

If allowed, children would continue to be fed much needed meals that otherwise are not available due to a school/center closures and ensures children receive food assistance when needed during an emergency.

5. Specific Program requirements to be waived (include statutory and regulatory citations). [Section 12(l)(2)(A)(i) of the NSLA]:

The Louisiana Department of Education (LDOE) Division of Nutrition Support (DNS) request a waiver of regulations at 7 CFR 226.18(e) requiring documentation of enrollment to be updated annually. In addition, DNS is requesting a waiver of the regulations at 7 CFR 226.23 (e)(1) and (f).

6. Detailed description of alternative procedures and anticipated impact on Program operations, including technology, State systems, and monitoring:

If approved, LDOE DNS will provide technical assistance to CACFP daycare home sponsoring organizations, on behalf of daycare homes regarding the process and procedures for obtaining updated enrollment documentation and free and reduced priced applications. There are no impacts on technology, State systems, or monitoring.

7. Description of any steps the State has taken to address regulatory barriers at the State level. [Section (l)(2)(A)(ii) of the NSLA]:

There are currently no State level regulatory barriers related to this specific issue.

8. Anticipated challenges State or eligible service providers may face with the waiver implementation:

Our agency does not anticipate that the establishment of this statewide waiver will pose any additional challenges at the state or sponsor level. Alternatively, we anticipate this waiver will reduce challenges faced by daycare home sponsoring organization providers that cannot meet the annual enrollment and free and reduced eligibility update requirements due to social distancing practices and the state "stay at home" order because of COVID-19. Children can still benefit from meal service and daycare home sponsors can use encumbered resources.

9. Description of how the waiver will not increase the overall cost of the Program to the Federal Government. If there are anticipated increases, confirm that the cost will be paid from non-Federal funds. [Section 12(l)(1)(A)(ii) of the NSLA]:

The establishment of this statewide waiver will not increase the overall cost of the Program to the Federal Government since these programs would be operating in situations where normal USDA Child Nutrition programs (NSLP/SBP) are closed due to COVID-19. There are no additional staff costs to implement this waiver.

10. Anticipated waiver implementation date and time period:

The anticipated waiver implementation start date is March 25, 2020. The waiver would apply to any daycare home up for renewal between March and June 30, 2020 and would allow for an extension to the application for 180 days after the annual renewal date. If the federally declared public health emergency extends beyond June 30, 2020, the State will submit an extension to this waiver.

11. Proposed monitoring and review procedures:

State agency staff who will approve sponsor's written requests to implement the waiver will monitor implementation of this waiver.

12. Proposed reporting requirements (include type of data and due dates(s) to FNS:

By March 2021, LDOE DNS will report to FNS the number of sponsoring organizations and daycare homes that used this waiver, including the number of meals claimed at those sponsors/ daycare homes.

13. Link to or copy of the public notice informing the public about the proposed waiver [Section 12(l)(1)(A)(ii) of the NSLA]:

The LDOE is seeking waivers from the USDA to support communities in providing meals to children in areas experiencing extended school closures in response to COVID-19.

<https://cnp.doe.louisiana.gov/breakingnews/Daycare%20Homes-%20Annual%20Forms%20Requirement.pdf>

14. Signature and title of requesting official:



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(225)342-3720

TO BE COMPLETED BY FNS REGIONAL OFFICE:

FNS Regional Offices are requested to ensure the questions have been adequately addressed by the State agency and formulate an opinion and justification for a response to the waiver request based on their knowledge, experience and work with the State.

Date request was received at Regional Office:

- Date Received: _____
 - ☐ Check this box to confirm that the State agency has provided public notice in accordance with Section 12(l)(1)(A)(ii) of the NSLA
- **Regional Office Analysis and Recommendations:**
 - ☐ Recommend Approval
 - ☐ Recommend Denial